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February 1, 2024

BY ECF

Honorable Paul A. Crotty
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Mills, et al. v. New York City, New York, 23-CV-7460 (PAC)(OTW)

Dear Judge Crotty:

I am an attorney in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York. This Office represents Defendant New York City in the above-referenced litigation.

On December 8, 2023, Defendant filed its motion to dismiss the Complaint pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). See Docket Entry Nos. 13-15. Plaintiffs filed their opposition to the motion to dismiss on January 22, 2024, following a request for additional time that was granted by Your Honor on January 4, 2024. See Docket Entry No. 18. Defendant's reply papers are now due February 5, 2024. See id. Defendant seeks additional time to submit a reply to Plaintiffs' opposition.

Plaintiffs challenge a slew of important City laws and rules regulating firearms in the City of New York. As such, this case implicates significant interests for the City of New York and counsel for Defendant has accordingly devoted substantial time to a consideration of the Second Amendment issues raised by the Complaint. Second Amendment jurisprudence continues to rapidly develop and undersigned counsel requests an extension of time to be able to properly respond to Plaintiffs' counter-arguments, particularly in light of numerous pressing deadlines in other assigned cases. Accordingly, Defendant seeks a two-week extension of time (until February 19, 2024) to submit reply papers. Counsel for Plaintiffs has consented to this request.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/

Nicholas Ciappetta
Senior Counsel

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